

Cahoy Dec. Ex. 17

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 CIVIL ACTION NO. 3:21-cv-03825-VC
6

7 IN RE: DA VINCI SURGICAL ROBOT ANTITRUST LITIGATION
8

9 THIS DOCUMENT RELATES TO: ALL CASES

10 SURGICAL INSTRUMENT SERVICE COMPANY, INC.,

11 Plaintiff,

12 vs.

13 INTUITIVE SURGICAL, INC.,

14 Defendant.
15

16 CONFIDENTIAL ATTORNEYS' EYES ONLY
17 REMOTE VIDEO 30(b)(6) DEPOSITION OF
18 INTUITIVE SURGICAL, INC.
19 (THROUGH DEPONENT, NICKY GOODSON)
20 November 16, 2022
21

22 REPORTED BY: Laura H. Nichols
23 Certified Realtime Reporter,
24 Registered Professional
25 Reporter and Notary Public

1 Q. Anyone else?

2 A. The initial request was also
3 supported by Patrick Flanagan.

4 Q. Anyone else?

5 A. To my recollection, those were the
6 two primary requesters for the program.

7 Q. What is your understanding of
8 refurbishment within the context of Project Dragon?

9 A. Within the context of Project Dragon,
10 refurbishment is the replacement of worn components
11 on an expired Xi instrument to return to like-new
12 performance.

13 Q. Would it include -- let me begin
14 again.

15 Would refurbishment also include
16 inspection to determine whether any components
17 needed to be replaced to return the device to
18 like-new performance?

19 MS. CAHOY: Objection to form.

20 A. The refurbishment of a given
21 instrument would be based off a standard
22 replacement recipe based on risk -- higher risk
23 wear items.

24 Q. (BY MR. MCCAULLEY:) Let me -- you
25 said standard replacement -- and I missed the next

C E R T I F I C A T E

STATE OF ALABAMA

JEFFERSON COUNTY

I hereby certify that the above and foregoing deposition was taken down by me in stenotypy, and the questions and answers thereto were reduced to typewriting under my supervision, and that the foregoing represents a true and correct transcript of the deposition given by said witness upon said hearing, to the best of my ability.

I further certify that I am neither of counsel nor of kin to the parties to the action, nor am I in anywise interested in the result of said cause.

/s/ LAURA H. NICHOLS

Commissioner-Notary Public, State of AL

ACCR License No. 3, Exp. 9/30/2023

GA CCR No. 2714, Exp. 4/1/2023

TN LCR No. 679, Exp. 6/30/2023

Transcript Certified on 11/17/2022